UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

VS.

DAVID SIDOO, et al.,

Defendants.

Case No. 1:19-CR-10080-NMG

ASSENTED-TO MOTION TO TRAVEL WITHIN THE UNITED STATES

At the suggestion of Pretrial Services, Defendant Elisabeth Kimmel moves and respectfully requests that the Court permit her to travel within the United States and to spend time between her primary residence in Nevada and her house in San Diego. Mrs. Kimmel is currently under the direct supervision of Pretrial Services in Nevada and is also being monitored by the Boston Office. The Court's Order Setting Conditions of Release requires Mrs. Kimmel and all defendants to provide sufficient notice to Pretrial Services before any domestic travel. Mrs. Kimmel has discussed her travel plans with the Nevada Pretrial Services office and her counsel has discussed them with the Boston office. Neither office objects to her travel but requested that Mrs. Kimmel file this motion to notify the Court of her plans and the fact that she intends to spend several months away from her primary residence in Nevada. Pretrial Services does not anticipate any issues with her being supervised in California and does not object to her request or this motion. The Government assents to this motion.

Ms. Kimmel therefore respectfully requests the Court allow her to travel within the United States according to the Order setting her conditions of release and with the agreement of Pretrial Services.

1

Dated: April 18, 2019 Respectfully submitted,

ELISABETH KIMMEL,

By her attorneys,

/s/ Eóin P. Beirne

R. Robert Popeo (BBO # 403360)
Mark E. Robinson (BBO # 423080)
Eóin P. Beirne (BBO # 660885)
MINTZ, LEVIN, COHN, FERRIS, GLOVSKY AND POPEO, P.C.
One Financial Center
Boston, MA 02111
(617) 348-1707 (telephone)
(617) 542-2241 (fax)
rpopeo@mintz.com
mrobinson@mintz.com
ebeirne@mintz.com

RULE 7.1 CERTIFICATION

Pursuant to Rule 7.1, I hereby certify that I conferred with AUSA Eric Rosen and U.S. Pretrial Services, who assent o this motion.

CERTIFICATE OF SERVICE

I, Eóin P. Beirne, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on April 18, 2019.

/s/Eóin P. Beirne	
-------------------	--